

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

RAFAEL PEREZ,

Plaintiff,

vs.

LIBERTY MUTUAL INSURANCE AND
LIBERTY MUTUAL FIRE INSURANCE
COMPANY,

Defendant.

Civil Action No.: 2:16-cv-00712-WB

**CERTIFICATION OF CHARLES R.
MATHIS IV, ESQ. IN SUPPORT OF
MOTION TO BE RELIEVED AS
COUNSEL**

Charles R. Mathis IV, Esq., of full age, having been duly sworn upon his oath according to law deposes and says:

1. I am presently the attorney for the Plaintiff in the above captioned matter and as such I am fully familiar with the facts hereof. I make this certification in support of my motion to be relieved as counsel.

2. The Plaintiff entered into a written retainer agreement with Merlin Law Group, PA to provide for representation in the above matter.

3. Recently, the attorney client relationship has eroded to the point where it is completely unreasonable for the undersigned to continue to represent the Plaintiff. There are several reasons for this fact, however, if I were to detail the various and serious reasons why we are no longer able to continue with the attorney client relationship, it might reveal client confidences.

4. The Plaintiff has been unable to assist our office in the prosecution of this claim including the preparation of discovery responses.

5. Based on the foregoing, the attorney client relationship between the Plaintiff and the undersigned has deteriorated to the point where it is impossible for the undersigned to continue to provide legal representation to him.

6. As such, I would respectfully request that the Court permit the undersigned and the law firm of the Merlin Law Group, PA to be relieved as counsel to the Plaintiffs.

I hereby certify that the statements made are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

MERLIN LAW GROUP, P.A.

Dated: January 25, 2017

/s/ *Charles R. Mathis IV*

Charles R. Mathis IV, Esq.
125 Half Mile Road, Suite 200
Red Bank, NJ 07701
Telephone: 732-933-2700
Facsimile: 732-933-2702
Email: cmathis@merlinlawgroup.com